



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND, MID-ATLANTIC
9742 MARYLAND AVENUE
NORFOLK, VA 23511-3095

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NAVSTA NEWPORT RI
5090 3a

IN REPLY REFER TO

5090
Code OPNEEV4/JLC
October 11, 2007

Mr. David Brown

Newport, RI 02840-6944

Dear Mr. Brown:

Subject: FEASIBILITY STUDY - REVISION 1 FOR MARINE SEDIMENTS,
DERECKTOR SHIPYARD (SITE 19); NAVAL STATION, NEWPORT, RI

The Navy would like to thank you for your comments regarding the Marine Sediment Feasibility Study for Derecktor Shipyard (Site 19). Attached to this letter are the Navy's responses to your comments. I hope that the responses adequately address your concerns.

If you would like further discussion regarding either your comments or the Navy's responses, don't hesitate to contact me by phone at (757) 444-4217 or by email at james.colter@navy.mil.

Sincerely,

JAMES L. COLTER, P.E.
Remedial Project Manager
By direction of the
Commanding Officer

Enclosure

Copy to:
USEPA, Kymberlee Keckler
RIDEM, Paul Kulpa
NAVSTA Newport, Cornelia Mueller
NAVSTA Newport RAB, c/o Cornelia Mueller (4 copies)
NAVFAC Atlantic, Dave Barclift
TtNUS, Steve Parker
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**ATTACHMENT
RESPONSES TO COMMENTS FROM DAVE BROWN (RAB MEMBER, NEWPORT)
ON THE FEASIBILITY STUDY (DRAFT REVISION 1)
FORMER ROBERT E DERECKTOR SHIPYARD
NAVSTA NEWPORT, NEWPORT, RHODE ISLAND
COMMENTS DATED MAY 18, 2007**

Comment No. 1 – *Not being a pollution assessment/cleanup expert, I can't say much about technical aspects, other than to be impressed with the apparent thoroughness and competence of the work.*

As an educator, I was wishing that the Executive Summary and some other parts would explain things for lay readers a little more straightforwardly -- i.e.:

- *Is my impression right that the pollutants in the sediments are from some time ago, and no longer being added to or bubbling up into the water/air (especially now that onshore Derecktor has been cleaned up)?*
- *How horrible are the pollutants in hotspots DSY 27, 103, 29 and 03, as polluted sites go? [Maybe explain in the Exec Sum more like is stated at the beginning of Sec 2.2.2. Also, in some places, lay readers may be confused by statements like "...These estimates were well within the EPA target risk range of..." (p. 1-22).*
- *Do the action alternatives and costs assume that the aircraft carriers will have left and that their removal would not stirred up more bad stuff from the sediments? Need to wait until the aircraft carriers have left before doing any cleanup?*

Response: Thank you for your comments. The Executive Summary and other pertinent sections of the report will be revised to better address the questions raised in your comment. Brief responses to your questions are provided below.

- Yes, your impression about the source of contamination is correct. The contaminants present in marine sediment at the site are believed to result from past operations at the Derecktor Shipyard that resulted in contaminants being dumped or discharged directly into the bay. There is no evidence that contaminants have migrated into the marine sediment from onshore soil or groundwater.
- The contaminants at the site are not considered to be severe. Compared to other sites on base, the contaminants were present over a wider area and some were present at higher concentrations; however contaminant concentrations detected in the follow-up sampling in 2004 were considerably lower than previously detected. Although some potential risks were identified in the human health and ecological risk assessments that were conducted using the earlier data, due to apparent reduction in contaminant concentrations over time, in the Navy's opinion, the current risks are marginal.
- Yes, the alternatives were developed and costed with the assumption that the ships have been removed from the site and sediment conditions are similar to those found during the 2004 sediment sampling event. Because of the potential that moving the ships will alter the sediment by stirring up sand and silt, the Navy will not conduct any removal of sediment while the ships are in place.

Comment No. 2 – *As a citizen, it would seem to me that Alt 3 (capping and dredging) does not make sense. Alt 4 (dredging) would make sense, if the Navy wanted to get the site off the list and not be bothered with warning markers etc. near Piers 1 and 2. But it risks stirring up stuff. I wouldn't fault the Navy, EPA and RIDEM if you dredged just the very worst spots, or simply went for Alt 2 (warnings & monitoring), and see what happens.*

Increasingly, my value judgments want to take other aspects into account besides effects on a relatively few shellfish, shellfish hunters and shellfish eaters. (They can be encouraged elsewhere in the Bay.) I weigh quite heavily possible negative effects of the cleanups themselves -- danger of stirring up quietly resting stuff from below the sea bed and disrupting post-pollution sealife equilibria (even though not ideal), the fuel used, air pollution, the noise and dust, road wear and tear, and contaminated soils being dumped at someone else's portal.

I think also of the opportunity costs -- the good that might be done by using cleanup funds on more serious/volatile spots at NSN/elsewhere, or preventing pollution in present-day military operations (hence my ill-received inquiry at RAB about lead practice bullets being allowed again).

[As a resource economist, I know that such considerations, opportunity-costs and trade-offs are outside your current frameworks (which reflect 1970-80s' emphases on single-variate absolutes). But responsible analytical groups like Resources for the Future are bringing these into the policy-formation picture, and they could someday be part of EPA and RIDEM guidelines.]

Maybe I'm under-rating how bad the sediment at Derecktor is. If so, that might be brought out more clearly in the Executive Summary of the final FS.

Response: Thank you for your comments. Although it is true that some of the factors you mention, such as opportunity costs, are outside the current framework for determining whether remediation is required at the Navy's Installation Restoration program sites such as Derecktor Shipyard, the framework of the FS does require identification and evaluation of the possible negative effects of each of the cleanup options in the "short term effectiveness" evaluation. The Navy will give serious consideration during selection of the recommended cleanup alternative to any negative effects on the environment posed by the identified cleanup alternatives.